

DEPOSITION OF PAUL A. LONDYNSKY - 5/12/2005

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,

Plaintiff,

vs.

MATSON NAVIGATION COMPANY,
INC.,

Defendant.

No. 04-00049 H6/BMK

DEPOSITION OF PAUL A. LONDYNSKY

DATE: May 12, 2005

TIME: 9:31 a.m.

LOCATION: MATSON NAVIGATION COMPANY

555 12th Street

Oakland, California

REPORTED BY: Melissa Roen Williams, CSR, RPR

Certified Shorthand Reporter

License Number 12284

EXHIBIT "F"

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1 Q Who's in charge of the Matson Navigation
2 Claims Department?

3 A I guess that would report to Mr. Ben Gleason.
4 That's our Director of Loss Prevention, I believe is his
5 title. I'm not sure.

6 Q Are you aware of any other accidents where
7 anyone has accidentally stepped or fallen through the
8 gaps between the hatch covers and the grating on the
9 LIHUE?

10 A I'm not aware of any.

11 Q How about the two sister ships, the EWA and
12 the CHIEF GADAO?

13 A I'm not aware of any.

14 Q Let me go back to when stevedores are hurt on
15 Matson Navigation vessels in Honolulu.

16 Is there any mechanism in place now for making
17 the crew of the vessel aware of that accident?

18 A I'm not sure.

19 Q How about as of October 1, 2002?

20 A I'm not certain.

21 Q Did you ever consider the gaps between the
22 grading and the hatch covers on the LIHUE to be a safety
23 hazard?

24 MR. LACY: Objection; vague and ambiguous.

25 MR. EASLEY: You can answer.

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1 THE WITNESS: Not specifically, no.

2 BY MR. EASLEY:

3 Q Are you aware of any complaints about the gaps
4 between the gratings and the hatch covers on the LIHUE?

5 A No.

6 Q Same question for EWA and CHIEF GADAO.

7 A No.

8 Q When a longshoreman is hurt on a Matson
9 Navigation vessel, does Matson Navigation have any
10 system for reviewing the accident and taking measures to
11 prevent a reoccurrence?

12 A If we're aware of it and the vessel is aware
13 of it, the vessel will review an accident in a safety
14 meeting to see if there's anything that the vessel could
15 have done to prevent it.

16 Q Is there any requirement in place that Matson
17 Terminals, Inc. inform Matson Navigation when there's a
18 stevedorian accident on a Matson Navigation ship in
19 Hawaii?

20 A I'm not aware of any requirement.

21 Q When Matson ships arrive in Honolulu, is there
22 any type of pre-cargo operations safety inspection done
23 on the vessel before the longshoreman start work?

24 A Yes.

25 Q Okay. Who's involved in that inspection?

23

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1 same.

2 Q When someone on a Matson ship sees something
3 that they think needs correcting, they can file a form
4 called an NCR; is that right?

5 A That's correct.

6 Q I actually forgot this. It stands for what?
7 Noncompliance report?

8 A Nonconformity.

9 Q Nonconformance report. And who do those
10 reports go to when they're turned in?

11 A To my office.

12 Q And I take it you review them, and if you feel
13 action needs to be taken, you take action?

14 A Or route it to the appropriate person to take
15 action.

16 Q Have the gaps between the grating and hatch
17 covers on the LIHUE ever been the subject of an NCR?

18 A Not to my recollection.

19 Q Has Matson ever done any modifications to the
20 LIHUE or its two sister ships to narrow the gaps between
21 the gratings and the hatch covers?

22 MR. LACY: Objection; vague and ambiguous,
23 lacks foundation.

24 THE WITNESS: I don't know.

25 BY MR. EASLEY:

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1 STATE OF CALIFORNIA)
) ss.

2 COUNTY OF SANTA CLARA)
3

4 I, MELISSA ROEN WILLIAMS, Certified Shorthand
5 Reporter for the State of California, hereby certify
6 that the witness in the foregoing deposition,

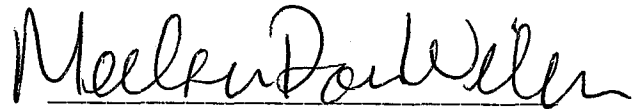
7 PAUL A. LONDYNSKY,

8 was by me duly sworn to tell the truth, the whole truth,
9 and nothing but the truth in the within-entitled cause,
10 and that the foregoing is a full, true, and correct
11 transcript of the proceedings had at the taking of said
12 deposition, reported to the best of my ability and
13 transcribed under my direction.

14

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16 Date: May 29, 2005



CSR NO. 12284

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